

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA (SAN DIEGO)

PERFECT 10, INC.

Plaintiff

**Case No. 13-CV- 0328 – BTM -
BLM**

JURY TRIAL DEMANDED

IWEB GROUP, INC., IWEB
INTELLECTUAL PROPERTY INC.,
IWEB TECHNOLOGIES, INC., AND
JOHN DOES 1-100

Defendants.

**DECLARATION OF MARTIN
LECLAIR IN SUPPORT OF
DEFENDANT IWEB
INTELLECTUAL PROPERTY'S
MOTION TO DISMISS
COMPLAINT**

I, Martin Leclair, hereby declare pursuant to 28 U.S.C. §1746 as follows:

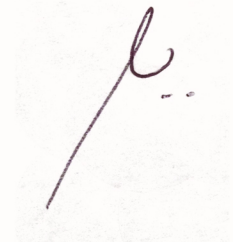
1. My name is Martin Leclair, and I am the Co-Founder and Vice President of iWeb Intellectual Property, Inc., a Canadian company, which has been sued in this U.S. District Court for the Southern District of California action. I am familiar with the facts underlying this case, and I am authorized to submit this

1 Declaration in support of Defendants' motion to dismiss the complaint filed by
2 Perfect 10, a California corporation.

3 2. iWeb Intellectual Property ("iWeb IP") is a Canadian-based licensing company,
4 domiciled at 20 Place du commerce, Nun's Island, Montreal (Quebec) Canada
5 H3D 1Z6, and formed to license software and other technologies in Canada,
6 from various entities, to allow its affiliate, iWeb Technologies to operate.

7 3. iWeb IP conducts no operations in the United States or in California. It has no
8 employees in the United States or California, and only serves its customers in
9 Montreal, Canada, has no server farm anywhere in the U.S., and any U.S.
10 suppliers only serve iWeb IP at iWeb IP's Canadian facilities.

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A handwritten signature in dark ink, consisting of a stylized 'C' followed by a horizontal line and a small dash.

1 I declare under penalty of perjury under the laws of the United States
2 of America that the foregoing is true and correct. Executed this 22d day of
3 April, 2013, at Montreal, Quebec, Canada.

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5 FURTHER AFFIANT SAYETH NOT.

6 This, the 22nd day of April, 2013.

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10 Martin Leclair
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